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December 20, 2024

VIA E-MAIL

Hon. Justin T. Quinn, U.S.M.J.
United States District Court for the District of New Jersey
402 East State Street, Chambers 4050
Trenton, New Jersey 08608

Re: Goydos, et al. vs. Rutgers, The State University of New
Jersey
Civil Action No. 3:19-cv-08966-RAK-JTQ

Dear Judge Quinn:

This firm represents Plaintiffs James S. Goydos and Maria E. Martins, in the above-captioned matter. Pursuant to the Court's text order dated December 16, 2024, I am responding to Your Honor's directive for an explanation as to any discovery not produced and in furtherance of responding to Defendant's December 13, 2024 correspondence at the last two pages.

Plaintiffs have now provided to Rutgers Dr. Goydos' executed authorizations and the consent order mentioned in defense counsel's October 29, 2024 letter. Furthermore, Plaintiffs have received and are reviewing the additional documents requested by Defendant. Many of these requests seek documents that were not contained within Defendant's initial discovery requests. We plan to produce these materials, subject to any applicable objections or privileges, once that review is completed.

To date, we have provided tax records which encompass Plaintiff Dr. Martin's employment compensation, Plaintiffs' benefits such as medical and dental, and Plaintiffs' retirement plan/401K. We have also provided a copy of Plaintiff Dr. Martins' CV/Resume, documents regarding estimates for household maintenance, and documents regarding payments to contractors such as lawn services and landscaping.

However, we have raised objection as to Rutgers' request for Plaintiff Dr. Martins' medical records. We have attempted to meet



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and confer with Rutgers' regarding this issue. We have also discussed same with our client who was concerned about privacy. However, we are withdrawing the objection and our client is producing to us a signed authorization for the requested treatment provider.

To the extent that there are additional materials to be produced, we respectfully request that the Court permit fourteen (14) days to do so.

Thank you for the Court's attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "KARA A. FINDEL".

KARA A. FINDEL, ESQ.

cc: All counsel of record with eCourts.
